STIPULATED ARBITRATION AWARD

Whereas, Claimant Amazon Digital Services, LLC ("Amazon") and Respondents Green Publishing Limited, Project Olympus Limited, and Jake Dryan ("Respondents") have agreed in a separate confidential agreement to settle the matters in issue between them and have further stipulated to this Stipulated Arbitration Award, it is hereby **ORDERED AS FOLLOWS**:

- 1. On September 6, 2017, Amazon filed a demand for arbitration (the "Demand") with the American Arbitration Association, entitled *Amazon Digital Services*, *LLC v. Green Publishing Ltd. et al.*, Case No. 01-17-0005-3168 (the "Action").
- 2. The Demand alleged claims against Respondents for: (1) breach of the Amazon Conditions of Use and the Kindle Direct Publishing Terms and Conditions; (2) breach of the Kindle Direct Publishing Terms and Conditions; (3) intentional interference with contractual relations; and (4) violations of the Washington Consumer Protection Act.
- 3. In the Demand, Amazon alleged that Respondents manipulated and abused the Kindle Direct Publishing ("KDP") service for financial gain and to the detriment of other KDP authors. Amazon alleged Respondents created duplicate content in violation of Amazon's rules and policies and used bots and/or "clickfarms" to inflate their page reads.
- 4. Respondents, along with each of their directors, principals, officers, employees, representatives, successors, agents, and assigns, shall be hereby enjoined from:
 - **a.** Engaging, encouraging, or assisting in any practice involving the creation or publication of duplicate content in violation of Amazon's rules and policies.
 - **b.** Engaging, encouraging, or assisting in any practice involving the use of a bot clickfarm, or other tool to artificially increase page views on Amazon in violation of Amazon's rules and policies.
 - **c.** Engaging, encouraging, or assisting in any practice that violates the Amazon Conditions of Use or Kindle Direct Publishing Terms and Conditions.
- 5. This Award shall bind Respondents. Respondents Green Publishing Limited and Project Olympus Limited shall provide a copy of this Award to their officers, agents, employees, principals, shareholders, and members.
- 6. Violation of this Award shall expose Respondents and all other persons bound by this Award to all applicable penalties, including contempt of Court.
- 7. All other claims, defenses or counterclaims, either actually asserted in this action or which could have been asserted in this action, by either party against the other, are hereby dismissed with prejudice.
 - 8. Amazon and Respondents shall bear their own attorneys' fees and costs.

IT IS SO ORDERED.

Dated this // day of January, 2018.

atherine Hendricks

Arbitrator